

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

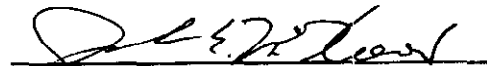
DOCKET NO. R97-1

**ANSWER OF UNITED PARCEL SERVICE WITNESS
STEPHEN E. SELICK TO INTERROGATORIES
USPS/UPS-T4-27(b)-(c) OF UNITED STATES POSTAL SERVICE
REDIRECTED FROM UPS WITNESS LUCIANI**

(February 11, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves and files the response of UPS witness Stephen E. Sellick to interrogatories USPS/UPS-T4-27(b)-(c) of the United States Postal Service redirected from UPS witness Luciani.

Respectfully submitted,



John E. McKeever
Attorney for United Parcel Service

PIPER & MARBURY, L.L.P.
3400 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103
and
1200 Nineteenth Street, N.W.
Washington, D.C. 20036-2430

Of Counsel.

**ANSWER OF UNITED PARCEL SERVICE
WITNESS STEPHEN E. SELICK TO INTERROGATORY
OF UNITED STATES POSTAL SERVICE**

USPS/UPS-T4-27. Please refer to pages 43-44 of your direct testimony, where you state that "the average weight of Priority Mail parcels observed in IOCS was 3.34 pounds" with footnote 41 referring to UPS-Sellick-WP-1-III-A.

* * *

(b) Please confirm that the 3.34 pounds was derived by computing an unweighted mean of the weight recorded on any IOCS direct tally of a Priority Mail IPP or parcel. If not confirmed, please explain how it was computed or derived.

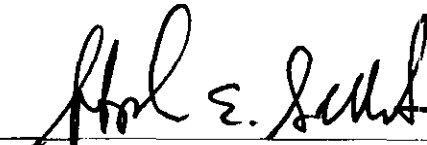
(c) Please list all assumptions needed for an average weight estimate obtained in this manner to be an unbiased estimate of the average weight of a Priority Mail IPP or parcel.

Response to USPS/UPS-T4-27. (b) Confirmed. Note that the mean weighted by IOCS Tally Dollars (F9250) would be 3.10 pounds for Priority Mail IPP/parcels and 1.03 pounds for Priority Mail flats.

(c) The unweighted average is an unbiased estimate if the average weight does not vary by IOCS sampling strata, essentially CAG. As noted in (b) above, the weighted average is not significantly different from the unweighted average.

DECLARATION

I, Stephen E. Sellick, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

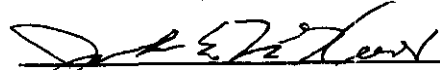


Stephen E. Sellick

Dated: February 10, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.


John E. McKeever

Dated: February 11, 1998
Philadelphia, PA